

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,
Plaintiff,

V.

HEWLETT PACKARD ENTERPRISE
COMPANY,
Defendant.

VIRTAMOVE, CORP.,
Plaintiff,

V.

INTERNATIONAL BUSINESS
MACHINES
CORP.,
Defendant.

Case No. 2:24-cv-00093-JRG
(Lead Case)

JURY TRIAL DEMANDED

Case No. 2:24-CV-00064-JRG
(Member Case)

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF E-DISCOVERY ORDER

Plaintiff VirtaMove Corp. (“VirtaMove”) and Defendants Hewlett Packard Enterprise Company (“HPE”) and International Business Machines Corp. (“IBM”) (collectively, “Defendants”), (collectively, the “Parties”) hereby jointly request that the Court enter the proposed E-Discovery Order, attached hereto as Exhibit A.

Dated: February 18, 2025

Respectfully submitted,

By: /s/ Daniel B. Kolko

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on February 18, 2025.

/s/ Daniel B. Kolko
Daniel B. Kolko

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Daniel B. Kolko
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